

UNITED STATES DISTRICT COURT

for the

Eastern District of Wisconsin

United States of America

v.

DEANDRE LANEY RODGERS (DOB: [REDACTED] 1986)
VIRIDIANA GARCIA-RAMIREZ (DOB: [REDACTED] 1998)

Case No. 22-mj-372

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 12/19/2021 and 04/05/2022 in the county of Racine in the Eastern District of Wisconsin, the defendant(s) violated:

Code Section

21 U.S.C. §§ 841(b)(1)(A) and 841(b)(1)(B); 18 U.S.C. §§ 922(a)(1)(A), 922(d), 922(a)(6), 922(g)(1), and 371

Offense Description

possession with intent to distribute 28 grams or more of a mixture and substance containing cocaine base; engaging in a firearms business without a license; transferring a firearm to a prohibited person, transferring a firearm to a prohibited person, false statement to a federal firearms licensee, unlawful possession of firearms and ammunition, and conspiracy to do the same

This criminal complaint is based on these facts:

See the attached affidavit.

☒ Continued on the attached sheet.



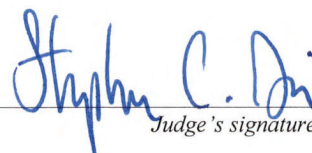
Complainant's signature

Special Agent Gabriel H. Lowrance (ATF)

Printed name and title

Sworn via telephone; transmitted via email pursuant to Fed. R. Crim. 4.1

Date: 04/05/2022



Judge's signature

City and state: Milwaukee, Wisconsin

Stephen C. Dries, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Gabriel H. Lowrance, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a criminal complaint for DEANDRE LANEY RODGERS (DOB: [REDACTED] 1986) and VIRIDIANA GARCIA-RAMIREZ (DOB: [REDACTED] 1998) for violations of 21 U.S.C. §§ 841(b)(1)(A) and 841(b)(1)(B) (possession with intent to distribute 28 grams or more of a mixture and substance containing cocaine base), 18 U.S.C. § 922(a)(1)(A) (engaging in a firearms business without a license), 18 U.S.C. § 922(d) (transferring a firearm to a prohibited person), 18 U.S.C. § 922(a)(6) (false statement to a federal firearms licensee), 18 U.S.C. § 922(g)(1) (unlawful possession of firearms and ammunition), and 18 U.S.C. § 371 (conspiracy).

2. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and have been since 2020. I have received training at the Federal Law Enforcement Training Center in Glynco, Georgia. I attended the Criminal Investigator Training Program, as well as ATF's Special Agent Training Program. With the ATF, I have received training and participated in numerous investigations into firearms trafficking, unlawful possession of firearms by prohibited persons, unlawful use of firearms, and drug trafficking.

3. Before I joined the ATF, I served as a police officer with the Robinson Police Department in Illinois and the Lake Havasu City Police Department in Lake Havasu City, Arizona. During part of my career as a police officer, I conducted investigations into street gangs, narcotics distribution, firearms violations, and violent crime.

4. Based on my training, experience and participation in drug trafficking and firearms trafficking investigations, I know and have observed the following:

- a. I have relied informants to investigate firearms trafficking and drug trafficking. Through informant interviews and debriefings of individuals involved in those offenses, I have learned about the manner in which individuals and organizations finance, purchase, transport, and distribute firearms and narcotics both within and outside of Wisconsin. I have utilized informants to conduct “controlled purchases” of firearms and controlled substances from individuals, as opposed to licensed gun dealers. I have also conducted surveillance of individuals engaged in firearms and drug trafficking and participated in the execution of numerous search warrants resulting in the seizure of drugs, firearms, ammunition, and magazines.
- b. Based on my training and experience, I have become familiar with the language utilized over the telephone to discuss firearms and drug trafficking and know that the language is often limited, guarded, and coded. I also know that firearms and drug traffickers often use electronic devices (such as computers and cellular phones) and social media to facilitate these crimes. Based on my experience, I know that firearms traffickers may keep photographs of these items on electronic devices.
- c. I also know that drug traffickers and firearms traffickers commonly possess—on their person, at their residences, at their places of business, in their vehicles, and other locations where they exercise dominion and control—firearms, ammunition, and records or receipts pertaining to such.
- d. I know that firearms traffickers and drug traffickers often put their telephones in nominee names to distance themselves from telephones that are utilized to facilitate these and related offenses. I also know that firearm and drug traffickers often use proceeds to purchase assets such as vehicles, property, jewelry, and narcotics. I also know that firearm and drug traffickers often use nominees to purchase or title these assets to avoid scrutiny from law enforcement.
- e. I know that “straw buying” is often used to provide a firearm to a person who cannot legally purchase one or to conceal the true owner of that firearm. Repetitive firearms purchases are one indicator of straw buying.

5. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other investigators and witnesses. Throughout this affidavit, I refer to case agents. Case agents are those federal, state, and local law enforcement

officers who have directly participated in this investigation, and with whom I have had regular contact regarding this investigation.

6. Because I submit this affidavit for the limited purpose of securing authorization for a criminal complaint, I have not included every fact known to me concerning this investigation. I have set forth only the facts that I believe are essential to establish probable cause.

PROBABLE CAUSE

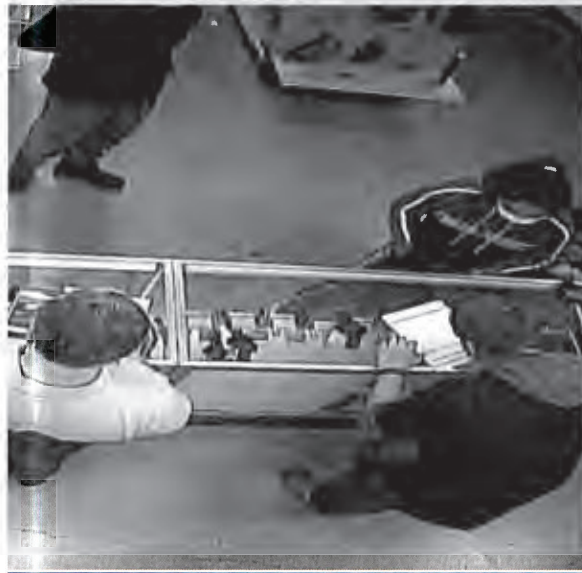
7. On November 7, 2021, the Mount Pleasant Police Department received a call for service requesting a welfare check on VIRIDIANA GARCIA-RAMIREZ. The call was made by Yazmin Cortez. In the notes section, that call for service read as follows: “17 calling from california/would like the welfare of her 2 yo nieces checked/childrens parents are viridiana Garcia 4-13-1998 and the father deandre l rodgers 4-8-1986/17 concerned because they are moving from hotel to hotel and were using 17s fathers credit card which he now cancelled/deandre uses meth and viridiana uses marijuana/no known weapons/17 doesnt know what room they are in/viridiana cell phone # 424-946-0032/they dont have a vehicle, they use lyft/17 would like a call back with results. Based on my training and experience, I know “17” is police code for complainant. The notes from that welfare check further indicate that officers of the Mount Pleasant Police Department went to the Knights Inn located at 1149 Oakes Road, Room 122, Mt. Pleasant, Wisconsin, and spoke with a neighbor. That neighbor indicated that the male, female, and child left approximately 20 minutes before the police arrived, and the officers were unable to contact RODGERS or GARCIA-RAMIREZ.

8. Case agents have reviewed firearm transaction records related to firearm purchases by Viridiana GARCIA-RAMIREZ. The purchases took place from December 2021 to March 2022

and were made at Dunham's Sports located at 5600 Durand Avenue, Racine, Wisconsin 53406, Dunham's Sports located at 6525 South 27th, Street, Franklin, Wisconsin 53132, and Paladin Protection Armory located at 7528 Pershing Boulevard, Suite B, Kenosha, Wisconsin 53142.

9. On December 19, 2021, Viridiana GARCIA-RAMIREZ purchased a Taurus International Model G2C 9mm pistol bearing serial number ACC726964 and a Glock Model 43 9mm pistol bearing serial number AFYZ003. I obtained video surveillance footage from this purchase, which showed GARCIA-RAMIREZ with a male wearing a black shirt and hood. The male is consistent with Deandre RODGERS, the known boyfriend of GARCIA-RAMIREZ. Both individuals appear to be with two young children. I know that RODGERS and GARCIA-RAMIREZ to have twin daughters in common. In the video, RODGERS and GARCIA-RAMIREZ appear to be looking over the firearm selection together. At one point, RODGERS is seen pointing to the firearms in the glass display case. GARCIA-RAMIREZ walks to RODGERS and points towards the same area. RODGERS appears to walk away as GARCIA-RAMIREZ points at the case and look in the direction behind the counter. GARCIA-RAMIREZ again points towards the case, and RODGERS returns and takes a squatting position and appears to be looking where GARCIA-RAMIREZ pointed. Both GARCIA-RAMIREZ and RODGERS appear to be discussing and pointing at the firearms in the display case. GARCIA-RAMIREZ can later be seen completing the purchase documents for the firearm with RODGERS standing behind her away from the counter. Screenshots from the Dunham's surveillance video are depicted below:



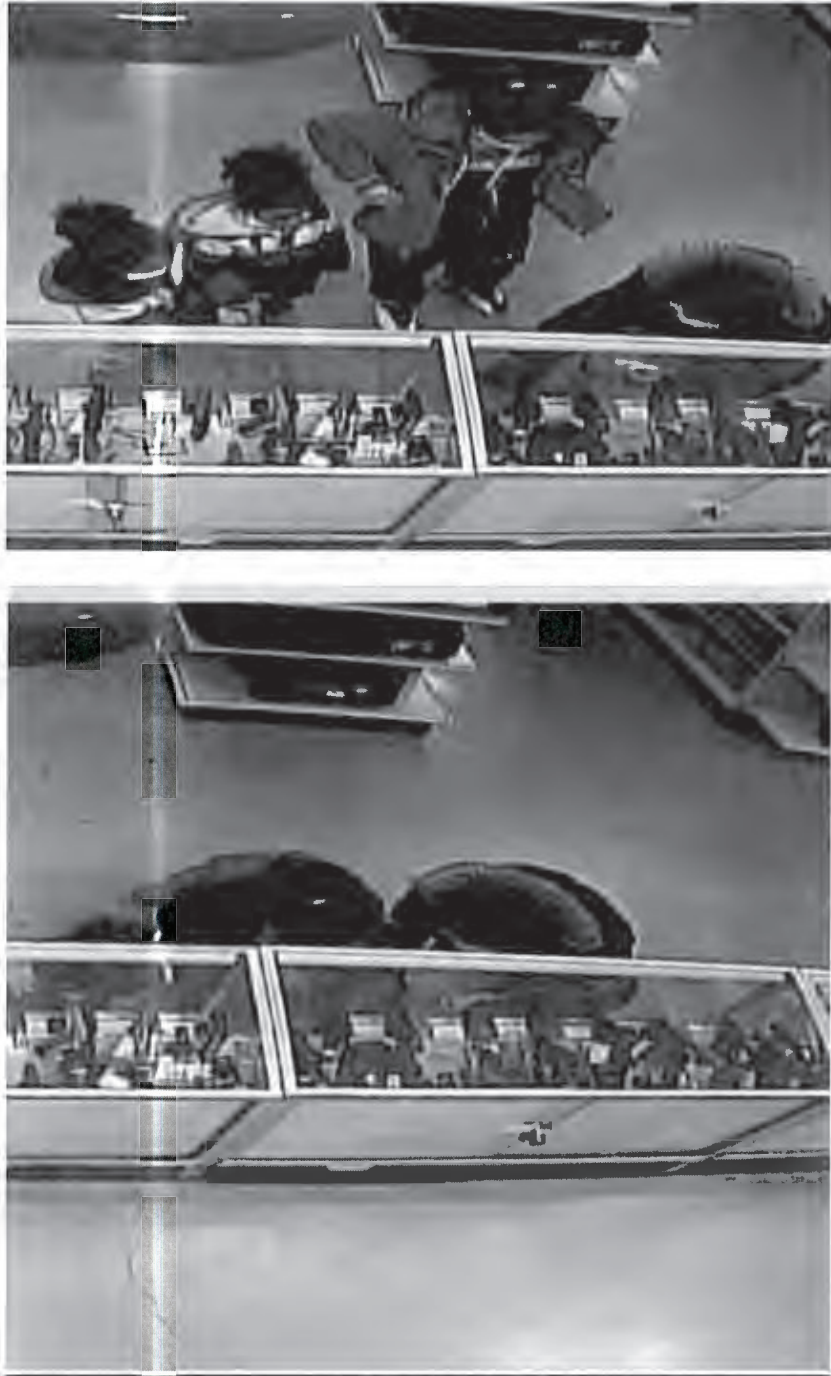


10. During the transaction, GARCIA-RAMIREZ identified herself with a Wisconsin identification card and a place of birth as Los Angeles, California. GARCIA-RAMIREZ provided the address of 5107 Byrd Avenue, Unit 211, Racine, Wisconsin 53406, as her residence. On the ATF Form 4473 ("Firearms Transaction Record"), GARCIA-RAMIREZ indicated that she was the actual transferee/buyer of the firearm(s) listed on this form. (The address at 5107 Byrd Avenue,

Unit 211, Racine, Wisconsin is also DEANDRE RODGERS's registered address with the Wisconsin Department of Transportation.)

11. On December 24, 2021, Viridiana GARCIA-RAMIREZ purchased a Taurus Model G3C 9mm pistol bearing serial number ACK399523 from Dunham's Sports. I obtained video surveillance footage from this purchase, which showed GARCIA-RAMIREZ with the same children as the purchase on December 19, 2021. As GARCIA-RAMIREZ stands at the counter, she appears to be looking at an item in her hands consistent with that of a cellular phone. That phone is consistent with the size of a smartphone. For a period of time, GARCIA-RAMIREZ appears to be alone with the children. She then appears to point to the display case, and a male walks up from the aisle behind her. The male is wearing a dark jacket with a hood and appears to be consistent with that of Deandre RODGERS. The two appear to discuss and point at the display case. A member of the staff appears to walk to the counter where RODGERS and GARCIA-RAMIREZ are standing. RODGERS appears to be pointing down towards the display case and looks at the employee. RODGERS appears to be speaking with the employee. Screenshots from the Dunham's surveillance video are depicted below:







12. During the transaction, GARCIA-RAMIREZ identified herself with a Wisconsin identification card and a place of birth as Los Angeles, California. GARCIA-RAMIREZ provided the address of 5107 Byrd Avenue, Unit 211, Racine, Wisconsin 53406, as her residence. On the ATF Form 4473 ("Firearms Transaction Record"), GARCIA-RAMIREZ indicated that she was the actual transferee/buyer of the firearm(s) listed on this form.

13. On December 30, 2021, Viridiana GARCIA-RAMIREZ purchased a GSG/Blue Line Solutions LLC Model GSG-16 .22 long rifle bearing serial number B106993. The surveillance video for this purchase could not be provided by Dunham's. Dunham's Sports provided receipts for the transactions. During the transaction, .22lr caliber ammunition was purchased for \$24.99.

14. During the transaction, GARCIA-RAMIREZ identified herself with a Wisconsin identification card and a place of birth as Los Angeles, California. GARCIA-RAMIREZ provided the address of 5107 Byrd Avenue, Unit 211, Racine, Wisconsin 53406, as her residence. On the

ATF Form 4473 ("Firearms Transaction Record"), GARCIA-RAMIREZ indicated that she was the actual transferee/buyer of the firearm(s) listed on this form.

15. On January 16, 2022, Viridiana GARCIA-RAMIREZ purchased an ACP Philippines/AP International-Pahrump NV Model 206 .38 special revolver bearing serial number RIA2339226 from Dunham's. I obtained video surveillance footage from this purchase, which showed GARCIA-RAMIREZ with the same children as the previous purchases and RODGERS. RODGERS can be seen pointing at the firearms display case and talking to GARCIA-RAMIREZ. GARCIA-RAMIREZ can later be seen completing the required purchasing documents. RODGERS can be seen standing near GARCIA-RAMIREZ as she completed the paperwork. Screenshots from the Dunham's surveillance video are depicted below:





16. During the transaction, GARCIA-RAMIREZ identified herself with a Wisconsin identification card and a place of birth as Los Angeles, California. GARCIA-RAMIREZ provided the address of 5107 Byrd Avenue, Unit 211, Racine, Wisconsin 53406, as her residence. On the ATF Form 4473 ("Firearms Transaction Record"), GARCIA-RAMIREZ indicated that she was the actual transferee/buyer of the firearm(s) listed on this form.

17. On January 21, 2022, Viridiana GARCIA-RAMIREZ purchased a Taurus Armas/Taurus International Model 856 .38 special revolver bearing serial number ACK414488 from Dunham's. I obtained video surveillance footage from this purchase, which showed GARCIA-RAMIREZ with RODGERS. RODGERS can be seen pointing at the display case and appears to be talking with GARCIA-RAMIREZ. An employee approaches the display case and appears to assist GARCIA-RAMIREZ. As the employee approaches, RODGERS walks away. The employee can be seen removing a firearm from the display case in the area where RODGERS was pointing. Screenshots from the Dunham's surveillance video are depicted below:



18. During the transaction, GARCIA-RAMIREZ identified herself with a Wisconsin identification card and a place of birth as Los Angeles, California. GARCIA-RAMIREZ provided the address of 5107 Byrd Avenue, Unit 211, Racine, Wisconsin 53406, as her residence. On the ATF Form 4473 ("Firearms Transaction Record"), GARCIA-RAMIREZ indicated that she was the actual transferee/buyer of the firearm(s) listed on this form.

19. On January 30, 2022, Viridiana GARCIA-RAMIREZ purchased a Ruger Model LCP .380 caliber auto pistol bearing serial number 379035490. I obtained video surveillance footage from this purchase, which showed GARCIA-RAMIREZ with RODGERS. Both appear to be looking in the display case and talking. RODGERS appears to be using a cellphone after walking away from the firearms display case. RODGERS continued to look at firearms in the display cases. GARCIA-RAMIREZ can be seen standing over RODGERS and appears to be using a cellphone. RODGERS can be seen pointing into a display case. An employee retrieved two firearms from the display case. GARCIA-RAMIREZ appears to be handed one firearm by RODGERS. RODGERS is handed a third firearm from the display case, but is only handled by RODGERS. RODGERS later walks to another display case. The employee appears to open another display and hand a firearm to RODGERS. RODGERS appears to be looking the firearm over as he turns it in his hands. GARCIA-RAMIREZ can be see standing close to RODGERS as he manipulates the firearm. The firearm is returned to Wright, and it is placed in the display case. RODGERS and GARCIA-RAMIREZ then walk away in separate directions. RODGERS appears to continue to browse the display cases and use a cellphone. GARCIA-RAMIREZ can be seen completing the purchase documents for the firearm. While waiting, GARCIA-RAMIREZ can be seen holding the firearm that had been removed from the case. Screenshots from the Dunham's

surveillance video are depicted below:



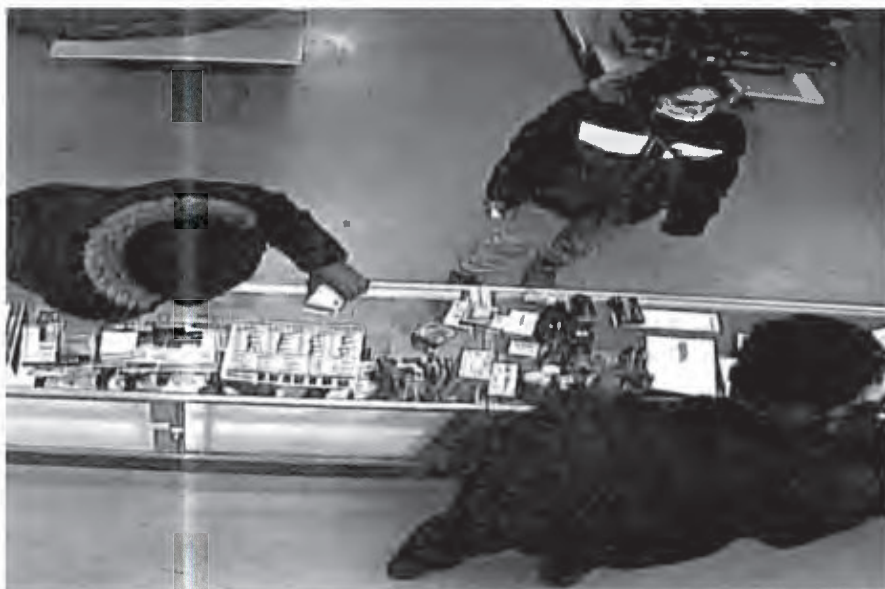


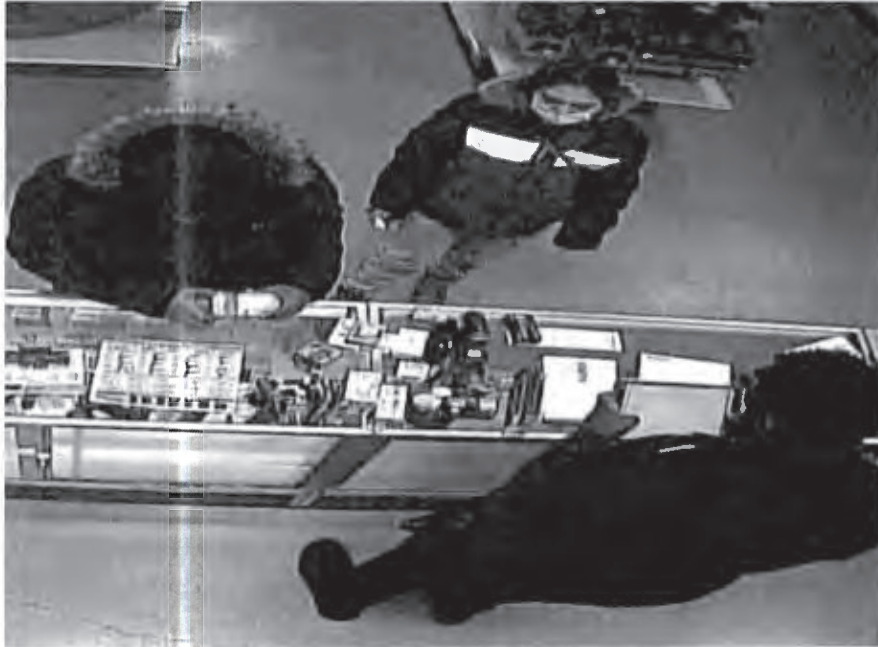


20. During the transaction, GARCIA-RAMIREZ identified herself with a Wisconsin identification card and a place of birth as Los Angeles, California. GARCIA-RAMIREZ provided the address of 5107 Byrd Avenue, Unit 211, Racine, Wisconsin 53406, as her residence. On the ATF Form 4473 ("Firearms Transaction Record"), GARCIA-RAMIREZ indicated that she was

the actual transferee/buyer of the firearm(s) listed on this form.

21. On February 11, 2022, Viridiana GARCIA-RAMIREZ purchased a Taurus Armas/Taurus International Model 856 .38 special revolver bearing serial number ACK450181. I obtained video surveillance footage from this purchase, which showed GARCIA-RAMIREZ with RODGERS. Both appear to be looking in the display case and talking. Both appear to be assisted by an employee identified by Dunham's as Nigel Scott. RODGERS appears to pick up a white box from the counter, consistent with that of ammunition. Screenshots from the Dunham's surveillance video are depicted below:





22. During the transaction, GARCIA-RAMIREZ identified herself with a Wisconsin identification card and a place of birth as Los Angeles, California. GARCIA-RAMIREZ provided the address of 5107 Byrd Avenue, Unit 211, Racine, Wisconsin 53406, as her residence. On the ATF Form 4473 ("Firearms Transaction Record"), GARCIA-RAMIREZ indicated that she was the actual transferee/buyer of the firearm(s) listed on this form.

23. On February 24, 2022, Viridiana GARCIA-RAMIREZ purchased a Smith & Wesson Shield M2.0 9mm pistol bearing serial number JNW8532, equipped with a red laser beam. During the transaction, GARCIA-RAMIREZ identified herself with a Wisconsin identification card and a place of birth as Los Angeles, California. GARCIA-RAMIREZ provided the address of 5107 Byrd Avenue, Unit 211, Racine, Wisconsin 53406, as her residence. On the ATF Form 4473 ("Firearms Transaction Record"), GARCIA-RAMIREZ indicated that she was the actual transferee/buyer of the firearm(s) listed on this form.

24. On February 24, 2022, case agents with the ATF conducted surveillance at the Knights Inn Racine, located at 1149 Oakes Road, Room 207, Racine, Wisconsin 53406, and observed a black male with glasses, believed to be DEANDRE RODGERS, enter Room 207.

25. On March 15, 2022, Viridiana GARCIA-RAMIREZ purchased a Glock Model 26 9mm pistol bearing serial number BWHW613 from Paladin Protection Armory, located at 7528 Pershing Boulevard, Suite B, Kenosha, Wisconsin 53142. During the transaction, GARCIA-RAMIREZ identified herself with a Wisconsin identification card and a place of birth as Los Angeles, California. GARCIA-RAMIREZ provided the address of 5107 Byrd Avenue, Unit 211, Racine, Wisconsin 53406, as her residence. On the ATF Form 4473 ("Firearms Transaction Record"), GARCIA-RAMIREZ indicated that she was the actual transferee/buyer of the firearm(s) listed on this form.

26. On March 25, 2022, case agents with the ATF conducted surveillance at the Knights Inn Racine, located at 1149 Oakes Road, Room 207, Racine, Wisconsin 53406. At approximately 1:38 p.m., case agents observed DEANDRE RODGERS emerge from Room 207 and return a short time later, and then observed VIRIDIANA GARCIA-RAMIREZ leave Room 207 with two small children about 10 minutes later and get into a black 2003 Kia Sorento bearing Wisconsin license plate AHY-2116. Case agents recognized the two small children from surveillance footage of GARCIA-RAMIREZ purchasing firearms at Dunham's Sports in Racine, Wisconsin. A few minutes later, RODGERS again left Room 207 and got into the same black 2003 Kia Sorento bearing Wisconsin license plate AHY-2116.

27. On March 29, 2022, Viridiana GARCIA-RAMIREZ purchased a Glock Model 27 .40 caliber pistol bearing serial number BWEL646 from Paladin Protection Armory, located at

7528 Pershing Boulevard, Suite B, Kenosha, Wisconsin 53142. During the transaction, GARCIA-RAMIREZ identified herself with a Wisconsin identification card and a place of birth as Los Angeles, California. GARCIA-RAMIREZ provided the address of 5107 Byrd Avenue, Unit 211, Racine, Wisconsin 53406, as her residence. On the ATF Form 4473 ("Firearms Transaction Record"), GARCIA-RAMIREZ indicated that she was the actual transferee/buyer of the firearm(s) listed on this form.

28. On March 30, 2022, Viridiana GARCIA-RAMIREZ purchased Smith & Wesson Shield M2.0 9mm pistol bearing serial number JNV3985, equipped with a red laser beam from the Dunham's Sports, located at 6525 South 27th Street, Franklin, Wisconsin 53132. This is the same model firearm that GARCIA-RAMIREZ purchased on February 24, 2022 from Dunham's Sports in Racine, Wisconsin. I spoke with a Key Team Manager at Dunham's Sports in Franklin, Wisconsin about the GARCIA-RAMIREZ's purchase on March 30, 2022. The Key Team Manager stated that GARCIA-RAMIREZ was accompanied by a black male during the purchase, along with two small children who the Key Team Manager believed to be twin girls. The Key Team Manager stated the male asked for a Smith & Wesson with a "red laser." The male then looked at the Smith & Wesson pistols with a red laser. The Key Team Manager removed the Smith & Wesson from the case, and GARCIA-RAMIREZ held the firearm. The Key Team Manager stated she did not feel GARCIA-RAMIREZ knew much about the Smith & Wesson pistol. GARCIA-RAMIREZ stated she wanted a pistol with a "green laser" and also stated she had been to Dunham's in Racine, Wisconsin and could not locate one. The male asked GARCIA-RAMIREZ if she wanted a "Hellcat" with a green laser and also told GARCIA-RAMIREZ that "color did not matter." During the transaction, the Key Team Manager asked GARCIA-RAMIREZ

if the firearm was for her or the male. GARCIA-RAMIREZ stated the firearm was for her and not the male. GARCIA-RAMIREZ appeared to be more knowledgeable about the “hellcat”. I know a “Hellcat” is a model of semi-automatic 9mm pistol manufactured by Springfield Armory and can be equipped with a laser beam sight.

29. Each of the firearms described above is between a few and several hundred dollars.

30. On April 2, 2022, officers of the Racine Police Department conducted a traffic stop of the black 2003 Kia Sorento bearing Wisconsin license plate AHY-2116 in 1500 block of South Green Bay Road. The driver of the vehicle was DEANDRE RODGERS, and GARCIA-RAMIREZ was in the front passenger seat. RODGERS was cited for a traffic violation and arrested for an active child support warrant. During the traffic stop, GARCIA-RAMIREZ asked to speak with RODGERS at his request. The officer told GARCIA-RAMIREZ that he would need to search her purse if she wished to speak with RODGERS in close proximity to the police squad car. GARCIA-RAMIREZ gave the officer consent, and she stated that she had a valid concealed carry permit. An officer seized a loaded Glock Model 27 .40 caliber pistol bearing serial number BWEL646 from GARCIA-RAMIREZ’s purse. During the traffic stop, RODGERS asked that all of his property be turned over to GARCIA-RAMIREZ and told the officer that they are currently living at the Knights Inn located at 1149 Oaks Road, Mt. Pleasant, Wisconsin. Officers offered to drive the vehicle to a parking lot to avoid towing, since GARCIA-RAMIREZ is not licensed to drive. RODGERS provided the officer consent to search the vehicle, and the officers found three boxes of 60 rounds of live ammunition and a receipt from Dunham’s Sports in Racine, Wisconsin for those three boxes of ammunition. Those items were purchased on April 2, 2022 at 13:30 hours according to the receipt—about 10 minutes before the traffic stop.

31. After the traffic stop, I interviewed DEANDRE RODGERS. During that interview, RODGERS said that GARCIA-RAMIREZ know that he is a felon. He also said that he provided her with \$100 to purchase ammunition on April 2, 2022—the date of his arrest—to go to the firing range on April 4, 2022. RODGERS provided an address of 1149 Oakes Road, Unit 207, Mount Pleasant, Wisconsin. He also provided his phone number as 414-676-7735. He provided GARCIA-RAMIREZ's phone number as 424-946-0032. RODGERS stated Viridiana GARCIA-RAMIREZ goes to a shooting range somewhere near 6 Mile Road in Racine, Wisconsin. I determined this shooting range to be The Shooter's Sports Center Inc. located at 4900 6 Mile Road, Racine, Wisconsin 53402.

32. On April 2, 2022, I obtained reviewed firearms range sign-in forms from The Shooter's Sports Center Inc. Those sign-in forms showed "Viridiana G" on a form dated March 18, 2022, with the phone number 424-946-0032, followed immediately by the name "Deandre R" with the phone number 414-676-7735. I know those phone numbers to be used by GARCIA-RAMIREZ and RODGERS, respectively. Those sign-in forms also showed "Viridiana G" on a form dated March 22, 2022, followed immediately by the name "Deandre R." I obtained video footage of the above dates and times from Shooter's Sports Center Inc. I observed GARCIA-RAMIREZ and RODGERS firing two separate handguns in two separate shooting lanes on video. The Shooter's Sports Center Inc. stated they do not ask for identification from individuals who bring their own firearms to the business. GARCIA-RAMIREZ and RODGERS were not asked for identification because they provided their own firearms and were then not required to complete the address field on the form.

33. Case agents have also reviewed jail calls from DEANDRE RODGERS after his

arrest on April 2, 2022. Some of those calls are summarized here. On April 2, 2022, RODGERS's placed a phone call to 424-946-0032 at 16:56 hours—the phone number for GARCIA-RAMIREZ. RODGERS told GARCIA-RAMIREZ that he was talked to by ATF. RODGERS believed the ATF interviewed him because he filed a false report with the Racine Police Department about GARCIA-RAMIREZ. On or about March 4, 2022, I know that a report was filed with the Racine Police Department stating that “Dariana Garcia” was selling firearms. The report also provided the phone number 424-946-0032, the phone number for GARCIA-RAMIREZ. GARCIA-RAMIREZ later states: “I still got to go to work, you know what I mean?” RODGERS and GARCIA-RAMIREZ discuss the firearm located during his arrest. He then instructs GARCIA-RAMIREZ to have a “heads up” if “they” come to talk to her at the hotel or “anywhere else” and to not lie. RODGERS again discusses the report he made to RPD. RODGERS stated to GARCIA-RAMIREZ they should have gone “straight to the spot” and not “procrastinating.” GARCIA-RAMIREZ stated she is going to “the spot.”

34. On April 2, 2022, RODGERS's placed a phone call to 424-946-0032 at 2003 hours— the phone number for GARCIA-RAMIREZ. When asked about her gun being taken, GARCIA-RAMIREZ stated it was the “27” and “there ain’t shit behind that” and she has not used it. I know that GARCIA-RAMIREZ was in possession of a Glock model 27 pistol during the arrest of RODGERS. GARCIA-RAMIREZ stated what “worries” her about it is if “they” ask her “where are they? Prove that you still have them.” RODGERS again states that he believes he was talked to by ATF because of the false report he made to the Racine Police Department about GARCIA-RAMIREZ. GARCIA-RAMIREZ asked RODGERS: “What’s going to happen with your P.O. in Cali?” RODGERS responded by stating: “Don’t mention that.” RODGERS believes the “P.O.”

will not find out because the arrest was not “criminal.” GARCIA-RAMIREZ also stated she went to “Michelle’s” house after receiving a phone call to “clean the house.” GARCIA-RAMIREZ gave “Michelle” what she “asked for.” Michelle also asked if she could have “it for free.” GARCIA-RAMIREZ stated she was asked by “Michelle” when she (GARCIA-RAMIREZ) goes to work for her (Michelle) if she can get “double for one?” RODGERS stated he will “tax her bitch ass now.” GARCIA-RAMIREZ stated she was told to call an unknown male she identified as “Scott” while talking about prices with “Michelle.”

35. On April 4, 2022, RODGERS placed a phone call to 424-946-0032—the phone number for GARCIA-RAMIREZ. RODGERS stated he was interviewed again on this date about GARCIA-RAMIREZ and firearms. RODGERS states “that move” would look suspicious to “them.” RODGERS asks GARCIA-RAMIREZ to not leave until “these folks” find out “what we did was nothing, no illegal shit.” RODGERS states if GARCIA-RAMIREZ leaves and he cannot contact her, he does not know what “other bullshit” will come. RODGERS indicates he believes the interview conducted by ATF on April 2, 2022 was to get him to talk about “what was going on.” RODGERS states to GARCIA-RAMIREZ they need to “stick together” because he does not want “to see you go to jail.” He also does not want “them” to believe that she is “running from something.”

36. On April 4, 2022, I observed a black 2010 Chevrolet Equinox bearing Wisconsin temporary license plate V1638G and vehicle identification number 2CNFLGEW8A6321722 registered to Deandre Laney Rodgers at 5107 Byrd Avenue, Unit 211, Racine, Wisconsin parked in front of Room 207 of the Knights Inn, located at 1149 Oakes Road, Mt. Pleasant, Wisconsin 53406.

37. On April 5, 2022, the Honorable Stephen C. Dries, United States Magistrate Judge of the Eastern District of Wisconsin, issued a warrant to search the premises located at Room 207 of the Knights Inn, located at 1149 Oakes Road, Racine, Wisconsin 53406 in Case No. 22-M-367 (SCD), amongst other warrants.

38. On April 5, 2022, case agents executed the search warrant and recovered 29-individually wrapped sandwich bags containing a white, rocky substance inside of a sandwich bag box, sitting next to two digital scales and approximately \$800 on top of the bathroom sink, which later field tested positive for cocaine base with an approximate weight of 34.5 grams. Case agents also recovered an extended magazine with 12 .40 caliber rounds of ammunition. Case agents found Chase bank paperwork, a California driver's license, and social security card for DEANDRE RODGERS and Wisconsin Emergency Rental Assistance paperwork in name VIRIDIANA GARCIA-RAMIREZ. Case agents also found a letter likely from GARCIA-RAMIREZ referring to RODGERS as a "pedophile" and stating that GARCIA-RAMIREZ was leaving with the children. Business records from the Knights Inn indicated that Room 207 was rented to "Madeline Garcia," "Mad Garcia," or Deandre Rodgers between approximately November 2021 to April 2022. The phone number listed is the same as that for GARCIA-RAMIREZ.

39. I know from my training and experience that the amount and packaging of the cocaine base recovered from GARCIA-RAMIREZ and RODGERS's room at the Knights Inn is consistent with drug trafficking, along with the digital scale and packaging materials.

40. As case agents were completing the search at the Knights Inn, DEANDRE RODGERS returned. Case agents spoke with DEANDRE RODGERS, who stated in substance: RODGERS admitted to knowing that GARCIA-RAMIREZ purchased firearms and that GARCIA-

RAMIREZ transported at least three firearms to family in Phoenix, Arizona. RODGERS claimed that GARCIA-RAMIREZ sold crack cocaine in the past.

41. On April 5, 2022, case agents also spoke with VIRIDIANA GARCIA-RAMIREZ, who was boarding a Greyhound bus to Phoenix, Arizona, along with two children. GARCIA-RAMIREZ initially told agents that she was taking a Greyhound bus back to Racine, Wisconsin. GARCIA-RAMIREZ also stated in substance that she purchased firearms on behalf of RODGERS, and that RODGERS took those firearms to the address on Byrd Avenue and that she never saw the firearms again. GARCIA-RAMIREZ stated that she was aware of the white substance, referring to the crack cocaine, in the motel room, but stated that she had never handled the cocaine. GARCIA-RAMIREZ said that she aware that RODGERS had sold some of the firearms in the past. GARCIA-RAMIREZ said that she located text messages on RODGERS's phone between RODGERS and a contact "my daughter" that were sexually explicit, suggesting that RODGERS had a sexual relationship with "my daughter."

42. GARCIA-RAMIREZ also consented to the search of her two suitcases. Inside the suitcases, case agents found a loaded Smith & Wesson M&P Shield 9mm pistol with a laser beam with an extended magazine, along with personal use amounts of marijuana.

43. Based on a review of publicly accessible court records, RODGERS has previously been convicted of battery by a prisoner, a felony, in violation of Wisconsin Statute 940.20(1), in Racine County Case Number 2002CF000075. He is, therefore, prohibited from possessing firearms and ammunition, pursuant to 18 U.S.C. § 922(g)(1).

CONCLUSION

44. Based on the above information and facts, I submit that there is probable cause to believe that DEANDRE RODGERS and VIRIDIANA GARCIA-RAMIREZ have violated the laws of the United States, including 21 U.S.C. §§ 841(b)(1)(A) and 841(b)(1)(B) (possession with intent to distribute 28 grams or more of a mixture and substance containing cocaine base), 18 U.S.C. § 922(a)(1)(A) (engaging in a firearms business without a license), 18 U.S.C. § 922(d) (transferring a firearm to a prohibited person), 18 U.S.C. § 922(a)(6) (false statement to a federal firearms licensee), 18 U.S.C. § 922(g)(1) (unlawful possession of firearms and ammunition), and 18 U.S.C. § 371 (conspiracy).